

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY III LLC, et al., Post-Effective Date Debtors.¹	§ § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR’S FIFTEENTH
OMNIBUS OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE
BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN
CLAIMS (AMENDED AND SUPERSEDED CLAIMS)
(Related Docket No. 2556)**

The undersigned hereby certifies as follows:

1. On July 19, 2022, the *Plan Administrator’s Fifteenth Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims (Amended And Superseded Claims)* [Docket No. 2556] (the “Objection”) was filed with the Court by the administrator of the chapter 11 plan (the “Plan Administrator”) of the above-captioned post-effective date debtors.

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

2. Responses, if any, to the Objection were required to have been filed with the Court on or before August 18, 2022 (the “Response Deadline”).

3. After the filing of the Objection, the Plan Administrator received certain formal and informal responses to the Objection. More particularly, on August 15, 2022, Swiss Re Corporate Solutions Insurance Corporation f/k/a North American Specialty Insurance Company (“Swiss Re”) filed that certain *Response of North American Specialty Insurance Company n/k/a Swiss Re Corporate Solutions Insurance Corporation to Plan Administrator’s Fifteenth Omnibus objection to Claims* was filed on August 15, 2022 [Docket No. 2628] (the “Swiss Re Response”). The Swiss Re Response indicated that Swiss Re had no objection to entry of an order disallowing its original, superseded claims provided that any such order would no effect on any further amendment of Swiss Re’s claims not disallowed by such order. Counsel for the Plan Administrator has confirmed, *via* email, that Swiss Re has no objection to the presentation hereunder of the proposed order granting the Objection. Additionally, the Plan Administrator received certain informal comments from the United States Department of Interior, which were resolved through the terms, as Ordered, set forth in that certain *Stipulation and Agreed Order Withdrawing (I) Superseded Administrative Expense Proof of Claim and (II) Objection to Administrative Expense Claim* [Docket No. 2634].

4. Attached hereto is an amended proposed form of order (the “Proposed Order”) granting the Objection, which incorporates the resolutions discussed in the preceding paragraph. A redline of the Proposed Order against the proposed form of order submitted with the Objection is also attached hereto. Accordingly, the undersigned respectfully requests that the Proposed Order granting the Objection be entered at the earliest convenience of the Court.

Dated: September 7, 2022

/s/ Michael D. Warner

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Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of September, 2022, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner, Esq.